# United States House of Representatives Subcommittee on Social Security of the Committee on Ways and Means

### Statement by

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# Oversight Hearing on the Social Security Administration's Role in Verifying Employment Eligibility April 14, 2011

Chairman Johnson, Ranking Member Becerra, and Members of the Subcommittee, my name is Joe Dirago and I am President of the National Council of Social Security Management Associations (NCSSMA). I have been the manager of the Social Security office in Newburgh, New York for ten years and have worked for the Social Security Administration for 31 years, with 27 years in management. On behalf of our membership, I am pleased for the opportunity to submit this statement to the Subcommittee regarding our concerns on Employment Eligibility Verification and the potential impact on the Social Security Administration (SSA).

NCSSMA is a membership organization of nearly 3,400 SSA managers and supervisors who provide leadership in 1,299 community based Field Offices and Teleservice Centers throughout the country. We are the front-line service providers for SSA in communities all over the nation. We are also the federal employees many of your staff members work with to resolve problems and issues for your constituents who receive Social Security retirement benefits, survivors, disability benefits, and Supplemental Security Income. Since the founding of our organization over forty-one years ago, NCSSMA has considered our top priority to be a strong and stable SSA, one that delivers quality and prompt locally delivered service to the American public. We also consider it a top priority to be good stewards of the taxpayers' moneys.

In May 2008, our organization testified before this Subcommittee on issues related to a mandatory employment eligibility verification system and the potential impact on the Social Security Administration. This statement for the record provides current information and challenges for SSA with the current E-Verify system, key issues confronting our agency, a review of SSA's funding situation, and an assessment of what increasing SSA's role in immigration verification would mean to service delivery.

NCSSMA has critical concerns about the dramatic growth in our workloads and receiving the necessary funding to maintain service levels vital to millions of people. Despite agency strategic planning, expansion of online services, significant productivity gains, and the best efforts of management and employees, SSA still faces many challenges to providing the service that the American public has earned and deserves.

## The Social Security Number for Employment Eligibility & Identity Purposes

When the Social Security Act was enacted in 1935, Social Security Numbers (SSN) were established to credit workers with earnings accumulated that eventually entitled them to benefits. The SSN was never intended to be a national identifier. Use of the Social Security Card to assist in determining eligibility for employment was first authorized in 1986, more than 50 years after the first SSN was issued. At that time, employers were required to confirm the eligibility of their new employees by reviewing the original Social Security Card. If the card was not available, the employer was allowed to contact SSA to verify that the SSN matched the new employee's name and age. A voluntary Employer Enumeration Verification System (EEVS) was created to allow employers with a large volume of new hires to check their status quickly.

Because of the prevalence of undocumented workers in certain areas of the country, an electronic verification system known as "Basic Pilot" was established as a joint venture between the U.S. Citizenship and Immigration Service (USCIS) in the Department of Homeland Security (DHS) and SSA's EEVS, as part of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996. The pilot was originally limited to five states: California, Illinois, Florida, New York, and Texas, as these were the states with the largest estimated populations of non-citizens not lawfully present in the United States. Nebraska was added to the Basic Pilot in 1999 due to the prevalence of undocumented workers in the meat packing industry in that state. Employers in these six states were then allowed to expand the program to their locations in other states. National use of the Basic Pilot was authorized in 2003.

DHS introduced the E-Verify system in 2007, which is an updated version of Basic Pilot and in current use. E-Verify is an easy to use web-based system that allows participating employers to determine whether newly hired employees are authorized to work in the United States under immigration law. While DHS is responsible for enforcing the prohibitions on unauthorized employment, SSA plays a key role in the voluntary verification process.

The E-Verify program allows employers to verify employee information taken from the Employment Eligibility Verification Form (Form I-9) against more than 455 million SSA records, more than 122 million Department of State passport records, and more than 80 million DHS immigration records. Employers may use the program once a hiring commitment is made to an employee to verify employment eligibility. If information on the records is discrepant, the employer receives a "tentative non-confirmation notice" (TNC). The notice indicates the source of the discrepancy, and issues a notice to the employee giving them eight days to contact DHS or SSA as appropriate to correct the discrepancy and to keep his/her job. If SSA requires additional information from the employee, more time is provided to correct the discrepant record.

E-Verify is available in all 50 states, the District of Columbia, Puerto Rico, Guam, and the U.S. Virgin Islands. Under federal law, the program is voluntary for employers except for participation by federal agencies, the legislative branch, and federal contract holders. State and local governments in 19 states and 25 localities have also required some level of E-Verify usage. Four states, Arizona, Mississippi, South Carolina, and Utah, and seven localities in California and Nebraska have made the use of E-Verify mandatory for most or all employers in their jurisdictions. The U.S. Citizenship and Immigration Services (USCIS) reports more than

246,000 employers are enrolled in E-Verify, representing more than 850,000 locations. In FY 2010, 16.5 million queries of the E-Verify system were processed. USCIS figures show that 98.3% of employees submitted for verification through E-Verify were automatically confirmed as work authorized. Another 0.3% were confirmed after resolution of the mismatch, and only 1.43% of employees submitted were found not authorized to work.

On March 21, 2011, the Secretary of Homeland Security announced the launch of E-Verify Self Check, allowing prospective employees to access their own information from DHS and SSA systems. This service allows job applicants to check their work-authorized status and correct any discrepancies on federal databases before applying for a job. It is currently available in five states and the District of Columbia, and will be expanded to the rest of the country on a rolling basis.

A number of immigration reform proposals include provisions mandating verification for all 7.7 million private and public sector employers throughout the country. Some proposals, such as H.R. 693, would make the use of E-Verify permanent and mandatory. The majority of employment verification proposals would rely on SSA to play a major role because the agency has a database with information about the entire American workforce, including information on citizenship status.

# Challenges for SSA with the Current E-Verify System

Although usage of E-Verify has increased in recent years, it is only used by 11% of the nation's current employers. In a "mandatory use" state such as Arizona, only one-third of its employers use E-Verify. This makes it difficult to project exactly how great an impact E-Verify would have on SSA's workloads if it were mandated nationally, as proposed in H.R. 693. According to USCIS statistics, 1.7% of E-Verify cases are discrepant and almost always require at least one visit to a local SSA office. Information provided by SSA's Office of Budget for an OIG report on E-Verify indicates SSA may see between 210,000 and 700,000 additional visitors at Field Offices over a five-year period. This number constitutes a 5% to 16% increase in visitor traffic to Social Security Field Offices. SSA Field Offices that would be most affected by the mandatory use of E-Verify are already struggling with large volumes of visitors and extensive waiting times. Given the reality of the federal budget process, TNC cases would create still longer waiting times, and negatively affect the ability of Field Office employees to complete core Social Security business.

Not only would the universal use of E-Verify generate a significant number of additional contacts with SSA, there are also problems and limitations related to the process that must be acknowledged regarding use of the program as an employment eligibility verification system.

• Employer Input Error: While DHS has added an alert to the employer to reduce the number of input errors made by employers, these errors still occur. The accuracy of the Numident check is only as good as the information input by the employer using the system. Sometimes the difference of a letter in a name (i.e. "Gregg" instead of "Greg") can create a tentative non-confirmation message. Date of birth and SSN input errors can also create this

problem. These errors can cause workers to make unnecessary trips to Social Security Field Offices in order to correct problems that do not exist.

- Discrepancies in Names Due to Marriage or Language: While newly married individuals who take their spouse's name should change their records with the Social Security Administration, there is often a delay in doing so. This discrepancy can cause a tentative non-confirmation message. In addition, differences in language customs can cause discrepancies between DHS and SSA records. In either case, eligible employees would receive a TNC notice and require a visit to an SSA Field Office.
- Repeat Visits to SSA Field Offices to Resolve Discrepancies: When an employee receives a tentative non-confirmation notice from E-Verify, it is not clear to either the employer or employee what discrepancy caused the problem. The message, "SSN Does Not Match" could relate to any of four discrepancies between the information input into the system and the SSA Numident database. The employee does not learn the real reason behind the discrepancy until he or she reports to the SSA Field Office and a representative reviews the case and informs the employee of the evidence needed. If the problem is due to a date of birth discrepancy, the employee must return with a birth certificate. If a name discrepancy exists due to marriage, a marriage certificate is needed. If the problem is because the citizenship status is discrepant, then immigration documents may need to be submitted. If any of these documents are not in the employee's possession, the employee would need to order a replacement document from the source, which may take weeks to obtain. Meanwhile, the employee's employment status remains unresolved. At the very least, the employee must make multiple trips to the local SSA Field Office to resolve the issue.
- Ineffectiveness of E-Verify in Identity Theft Cases: Recent incidents in Nebraska, Minnesota, Texas, Iowa, and Utah communities showed that concerns about the effectiveness of E-Verify checks are well placed. Swift & Company meat packing plants were raided by ICE officers in December 2006, resulting in the detainment of 1,282 employees, many later found to be ineligible to work in the United States. At the time of the raid, Swift was exonerated of any wrongdoing as they were using the Basic Pilot as prescribed by DHS. Identity theft was cited as the cause of undocumented worker employment in this case. In this instance, it was found that Basic Pilot or E-Verify was useless in stolen identity cases. Then DHS Secretary Michael Chertoff said at the time of the raids that Basic Pilot was, "not a magic bullet for every kind of problem."

## The Current State of SSA Operations

Over the last seven years, SSA has experienced a dramatic increase in Retirement, Survivor, Dependent, Disability, and Supplementary Security Income (SSI) claims. The additional claims receipts are driven by the initial wave of the nearly 80 million baby boomers who will file for Social Security benefits by 2030 -- an average of 10,000 per day! Concurrently, there has been a surge in claims filed due to worsening economic conditions and rising unemployment levels.

The need for resources in SSA Field Offices is also critical to process these additional claims and provide vital services to the American public. Field Offices are responsible for processing 2.4

million SSI redeterminations in FY 2011, a 100 percent increase over FY 2008. Nationally, visitors to Field Offices increased from 41.9 million in FY 2007 to 45.4 million in FY 2010. SSA is also experiencing unprecedented telephone call volumes. In FY 2010, SSA completed 67 million transactions over the 800 Number telephone network -- the most ever. NCSSMA estimates that Field Offices received an additional 32 million public telephone contacts.

Nationwide, over 3.2 million new disability claims were filed and sent to state Disability Determination Services in FY 2010. This surge of increased claims has created backlogs. At the end of FY 2010, the number of pending initial disability claims was at an all-time high of 824,192 cases -- a 46 percent increase from the end of FY 2008. SSA's largest backlogs are hearings appealing initial disability decisions, processed by the Office of Disability Adjudication and Review. Hearing receipts continue to rise, and as of March 2011, 728,013 hearings were pending which is nearly 23,000 more hearings than at the end of FY 2010.

## **Social Security Administration Funding**

Appropriations to the Social Security Administration are an excellent investment and return on taxpayer dollars. We greatly appreciate the increased funding that SSA received for Fiscal Years 2008 through 2010. Had SSA not received this funding, the service we provide would be much worse and the disability backlog would be unconscionable. With the support of Congress and significant increases in employee productivity, tremendous progress has been made to enhance public service, reduce the hearings backlog, and to process additional workloads.

### SSA Funding for FY 2011

NCSSMA supported the President's FY 2011 budget request of \$12.379 billion for SSA's administrative expenses. As NCSSMA President, in March 2011, I testified at a hearing before the Senate Committee on Appropriations, Subcommittee on Labor, Health and Human Services, Education, and Related Agencies, and wrote directly to President Obama and Congressional leaders about SSA's need to receive adequate funding to maintain service levels vital to 60 million Americans. NCSSMA requested that during negotiations on final spending levels for FY 2011, SSA be provided with funding to cover inflationary increases because it was critically necessary to keep up with our growing claims receipts, maintain the progress achieved on reducing the disability hearings backlog, process program integrity workloads, and meet customer service expectations. Despite SSA's enormous challenges, with the federal deficit concerns, attaining this level of funding in FY 2011 was not possible.

Inadequate funding of SSA in FY 2011 and rescissions have already had major repercussions including a hiring freeze, elimination of overtime, and postponements of efficiency initiatives. Reducing resources at the same time SSA workloads are increasing is not prudent and is a prescription for making a very productive agency that efficiently uses the taxpayers' moneys into one with significant service delays and mounting backlogs. Service deterioration resulting from inadequate FY 2011 funding levels will have a collateral negative impact on FY 2012.

#### President's Proposed FY 2012 SSA Budget

NCSSMA strongly supports the President's FY 2012 budget request for SSA and requests that Congress provides full funding to sustain the momentum achieved to allow the agency to:

- Reduce the initial disability claims backlog to 632,000 by processing over 3 million claims;
- Conduct disability hearings for 822,500 cases and reduce the waiting time for a hearing decision below a year for the first time in a decade;
- Reduce pending hearings to 597,000 from the FY 2010 level of 705,367; and
- Complete additional program integrity workloads yielding nearly \$9.3 billion in savings over 10 years, including Medicare and Medicaid savings by processing 592,000 medical Continuing Disability Reviews (CDRs) and 2.6 million SSI redeterminations.

## **Assessment of SSA Challenges**

### Field Office Service Delivery Challenges

SSA Field Offices vary in size, demographics, and location. However, all types of Field Offices are experiencing tremendous pressure because of our increased workloads and additional visitor traffic. The effect of funding Social Security in FY 2011 at FY 2010 levels or below exacerbates the situation and has already had a significant impact on local Field Offices around the country.

Frontline feedback from our busiest urban offices indicates that some have seen their visitor traffic explode with overflowing reception areas and increased waiting times. A manager of a busy SSA Field Office recently provided this comment:

• We handle close to 2000 visitors a week. Recent losses due to retirement are affecting the service we provide, as we cannot interview the public fast enough. If we cannot hire to fill losses, the public will wait longer and be disadvantaged. In addition, the safety of the employees becomes at risk as the public becomes frustrated at the long waits. (California)

Most of SSA has been under a hiring freeze because of the current funding situation. A hiring freeze for all of FY 2011 could result in a loss of over 2,500 SSA federal employees and up to 1,000 state employees in the Disability Determination Services. A SSA Field Office manager recently provided the following feedback about the effect of the current SSA hiring freeze:

• A hiring freeze will be detrimental, especially to the processing of our disability workloads. In the past 6 months alone, our office staff has been reduced from 57 to 53 employees. We are anticipating a minimum of four more losses and will be down to 49 by the end of the year – a 14% decline in staff. SSA employees take pride in their work knowing that the American public depends on us. Not having the resources to process workloads in a timely manner undermines the positive morale of the staff as well as the public's trust in our agency. (Texas)

As in-office visitors increase in already busy offices, there has also been an increase in reported security incidents. A November 2010, Office of the Inspector General (OIG) Report, "Threats against SSA employees or Property," indicates, "SSA has experienced a dramatic increase in the number of reported threats against its employees or property. The number of threats... increased by more than 50% in FY 2009 and by more than 60% FY2010." This SSA manager expresses the connection between staff losses and security concerns:

• A hiring freeze for all of FY 2011 would be devastating. We lost two employees and could not replace them. We are already seeing much more stress on staff members assuming the workloads of the employees we lost, and higher frustration levels from callers and visitors. The American public does not care that we are short on staff, they want to be seen quickly,

have their calls answered and get their issues resolved. I am concerned that this type of frustration will lead to more threats and acts of violence toward staff members. (Kentucky)

SSA has a highly skilled but aging workforce with about two-thirds of its over 60,000 employees involved in delivering direct service to the public. *SSA projects 50 percent of its employees, including 66 percent of supervisors, will be eligible to retire by FY 2018.* Serious concerns exist about the agency's ability to sustain service levels with the tremendous loss of institutional knowledge from SSA's front-line service personnel.

Geographical staffing disparities will occur with attrition leaving some offices significantly understaffed. This is especially problematic for rural SSA Field Offices that serve customers who often live vast distances away, may have no Internet service, and lack access to public transportation. In many rural areas, SSA is the face of the federal government.

SSA workloads are expected to grow exponentially as the baby boomers retire. Reducing resources while work is significantly increasing will result in substantial service delays and inefficiencies as SSA tries to cope with the mounting backlogs. SSA is a very productive agency that efficiently uses the taxpayers' moneys and must be maintained as such.

### **Program Integrity Investments**

SSA takes its stewardship responsibilities seriously and makes every effort possible to ensure the accuracy of benefit payments. SSA issues \$800 billion in benefit payments annually to 60 million people and takes its stewardship responsibilities seriously. If SSA is able to fulfill its FY 2011 program integrity targets the estimated program savings over the next ten years is nearly \$7 billion! The President's FY 2012 budget request includes \$938 million dedicated to program integrity, which saves taxpayer dollars and is fiscally prudent in reducing the federal budget and deficit.

- CDRs determine whether disability benefits should be ceased because of medical improvement. *Medical CDRs yield \$10 in lifetime program savings for every \$1 spent.*
- SSI redeterminations review nonmedical factors of eligibility, such as income and resources, to identify payment errors. SSI redeterminations yield a return on investment of \$7 in program savings over 10 years for each \$1 spent, including Medicaid savings accruals.

SSA budgetary constraints have caused the shortfall between the number of CDRs due and the number conducted each year. A SSA Office of Inspector General (OIG) report in December 2010, titled "Top Issues Facing Social Security Administration Management—Fiscal Year 2011" provides OIG's perspectives on the most serious SSA management challenges. The report indicates there is a significant need to increase the number of CDRs conducted by SSA because there is a backlog of approximately 1.5 million cases. If SSA completes all of the 1.5 million medical CDRs, the lifetime program savings would be over \$15 billion!

NCSSMA strongly encourages Congress to provide SSA with the necessary funding to reduce the medical CDR backlog and to conduct additional SSI redeterminations. Investment in program integrity workloads ensures accurate payments, saves taxpayer dollars and is fiscally prudent with regard to the federal budget and the ongoing administration of SSA programs.

### SSA Online eServices to Assist with Service Delivery Challenges

The expansion of services available to the American public via the Internet has helped to alleviate the number of visitors and telephone calls to SSA. However, the Internet is not keeping pace with the increasing demand for service, and high-volume transactions, such as Social Security Cards and benefit verifications are not available on the Internet, or are only being used to a limited degree. This represents over 40% of the 45.4 million visitors to SSA Field Offices.

NCSSMA believes that SSA must be properly funded in FY 2012 and beyond so that it may continue to invest in improved user-friendly online services to allow more online transactions. If individuals were able to successfully transact their request for services online, this would result in fewer contacts with Field Offices, improved efficiencies, and better public service.

#### **Disability Workload Processes**

Eliminating the disability hearings backlog continues to be SSA's top priority, and the agency has made a major resource investment to improve this situation. The agency's goal is to eliminate the backlog by 2013 and to improve processing time to 270 days. Commissioner Astrue has implemented several initiatives to achieve this goal, but this will depend on the available resources provided by SSA funding and the volume of new hearings received.

Annual appropriated funding levels for SSA have a critical impact on the hearings backlog. The increase in the disability hearings backlog is partially attributable to the significant underfunding of SSA. From FY 2004 to FY 2007, the final appropriated funding levels approved by Congress totaled \$854 million less than the President's requests. However, from FY 2008 to FY 2010, the cumulative final appropriation level was \$203 million more than the President's requests. In addition, SSA received nearly \$1.0 billion in American Recovery and Reinvestment Act funding, which was utilized to help address the hearings backlog. The increased resources for SSA were even more essential as the agency's workloads grew at a rapid pace following the economic downturn. With the increased funding SSA has received in the last three fiscal years, the agency has opened or expanded 19 Hearing Offices, including a fifth National Hearing Center, hired 228 Administrative Law Judges and additional support staff.

SSA's efforts have resulted in significant progress in reducing both the number of pending hearings and the amount of time a claimant must wait for a hearing decision. At the end of FY 2010, the pending hearings were reduced to 705,367 cases nationwide, the lowest level in five years. In March 2011, the average processing time for a hearing was 359 days, the lowest level since December 2003. Even though this is positive news, the Hearing Offices are facing a significant wave of new hearings with approximately 400,000 additional hearings filed from FY 2009 through FY 2011 (projected) than were filed in FY 2008. This is attributable to the increased number of disability claims filed since the economic downturn beginning in 2008.

The Congressional Budget Office (CBO) released a report July 22, 2010: "Social Security Disability Insurance: Participation Trends and Fiscal Implications." According to this report, disability beneficiaries tripled from 2.7 million to 9.7 million people from 1970 to 2009. The CBO projects the number of disability beneficiaries will grow to 11.4 million by 2015. In FY 2011, SSA anticipates receiving 629,000 more initial disability claims than in FY 2008.

It is essential to provide adequate funding to SSA to maintain the momentum achieved in reducing the number of disability cases pending and the processing time for these cases. Unfortunately, the number of claims and hearings pending is still not acceptable to Americans who need Social Security for support of their families. *Progress was undermined by the FY 2011 budget impasse, resulting in the suspension of opening eight planned Hearing Offices in Alabama, California, Indiana, Michigan, Minnesota, Montana, New York, and Texas.* This significantly weakens SSA's efforts to eliminate the hearings backlog by FY 2013.

### **Information Technology Investments**

SSA is confronted with significant challenges in managing its Information Technology (IT) programs to keep up with rapidly expanding workloads. NCSSMA believes it is critical that SSA receive adequate funding to allow for much-needed IT investments. This is vitally necessary for SSA to replace the aging National Computer Center, to maintain systems continuity and availability, upgrade the agency's telephone system, and to improve IT service delivery. SSA's initiatives to implement automation and technological efficiencies are vitally important to the success of the agency.

### Considerations Relevant to Increased Use of E-Verify and SSA Service Delivery

Regardless of your perspective on the expansion of E-Verify, one of the key questions before this Subcommittee is the potential impact of mandatory employment eligibility verification on SSA's service delivery. While NCSSMA is not taking a position on the underlying goal of any of the immigration bills before Congress, we believe it would not be prudent to require SSA to assume the burden of verifying the work status of every employee without full consideration of all issues, including the need for adequate funding.

A December 2010 Government Accountability Office (GAO) Report on Employment Verification (*Federal Agencies Have Taken Steps to Improve E-Verify, but Challenges Remain*, GAO-11-146) found that USCIS and SSA have taken actions to prepare for possible mandatory national implementation of E-Verify. However, USCIS's estimates do not include all costs associated with maintaining and operating E-Verify and SSA's estimates do not consider the risk associated with changes in SSA's E-Verify workload. This leaves the agencies at increased risk of not securing sufficient resources to effectively execute program plans in the future.

As noted above, SSA's service delivery system is under extreme pressure! While SSA is attempting to improve service by means of Internet service expansion, the need for trained and knowledgeable employees to assist the American public will continue to be required. The SSA Field Office is the face of the federal government, and the agency takes great pride in providing a high level of public service. Yet, even the dedication of SSA employees and management would be sorely tested if legislation is enacted requiring SSA to verify employment eligibility for all employees. Increases of even 5% to 16%, in SSA visitors because of mandated E-Verify workloads will further delay already strained services to vulnerable populations. SSA managers are already making difficult service delivery decisions because of insufficient staff, which either extend waiting times or cause Field Office phones to go unanswered. Any addition of a workload that is outside of SSA's core responsibilities will only exacerbate those problems.

In addition, the infrastructure required to increase the staff and systems capacity and capability to provide increased immigration verification services requires time. A minimum two-year training period is needed to properly prepare a Claims Representative to perform their duties. This training also requires removing some of our most productive employees from the front lines to provide mentoring. Efforts to improve SSA computer systems to deal with already increasing internal and external demands would also be delayed to implement these proposed programs.

NCSSMA understands the need for Congress to consider legislation that would expand or mandate an effective employment verification system to ensure a legal workforce and protect workers' identities, but the Social Security Administration must be safeguarded to achieve its primary mission. Establishing a national employment verification system, using SSA systems and employees, to confirm the employment status of every American worker would have a major impact on the financial resources of the Social Security Administration. This additional workload would hamper the agency's ability to provide services to its core beneficiaries -- the American workers who have paid their Social Security payroll taxes and earned the right to have their Social Security matters handled in a timely manner.

### Conclusion

NCSSMA believes that the American public demands and deserves to receive good and timely service for the tax dollars they have paid to receive Social Security. We believe the adoption of the provisions being discussed in current immigration legislation could jeopardize SSA's ability to provide these vital services. Any expansion of SSA's responsibilities would require a commensurate increase in funding to support it.

Social Security is one of the most successful government programs in the world and touches the lives of nearly every American family. We are a very productive agency and a key component of the nation's economic safety net for the aged and disabled, but sufficient resources are necessary. A strong Social Security program equates to a strong America and it must be maintained as such for future generations.

NCSSMA sincerely appreciates the Subcommittee's interest in the vital services Social Security provides, and your ongoing support to ensure SSA has the resources necessary to serve the American public. On behalf of the members of NCSSMA, I thank you for the opportunity to submit this written statement for the record and to state our viewpoints. NCSSMA members are not only dedicated SSA employees, but are also personally committed to the mission of the agency and to public service. We respectfully ask that you consider our comments, and would appreciate any assistance you can provide in ensuring the American public receives the necessary service they deserve from the Social Security Administration.

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